REMARKS

1. <u>Present Status of Patent Application</u>

This is a full and timely response to the outstanding non-final Office Action mailed June 29, 2006. Reconsideration and allowance of the application and presently pending claims are respectfully requested. The pending claims are believed to be allowable.

2. <u>Examiner Interview</u>

Applicants first wish to express their sincere appreciation for the time that Examiner Morrison spent with Applicants' Attorney, Mr. Charles W. Griggers, during a telephone discussion on September 19, 2006 regarding the outstanding Office Action. During the discussion, potential claim amendments were discussed. The Examiner indicated that the proposed amendments were potentially beneficial and they are contained herein. Thus, Applicants respectfully request that the Examiner carefully consider this response and the remarks & amendments contained herein.

3. <u>Response to Rejection of Claims under 35 U.S.C. § 112, Second Paragraph</u>

Claims 18 and 32 stand rejected under 35 U.S.C. § 112, Second Paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim subject matter in the claims. Claims 18 and 32 have been canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to the claims is rendered moot. Applicants take this action merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicant reserves the right to pursue the subject matter of the canceled claims in a continuing application, if Applicants so choose, and do not intend to dedicate any of the canceled subject matter to the public.

4. <u>Response to Rejections of Claims under 35 U.S.C. § 102</u>

In the Office Action, claims 1-9, 13, and 18 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by *Kuhn* (U.S. Patent No. 6,891,937).

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a. Claim 1

As provided in independent claim 1, Applicants claim:

> A trouble ticket handling system, comprising:
> login logic operable to log a user into a plurality of trouble ticket systems;
> a monitoring device operable to poll the plurality of trouble ticket systems comprising a plurality of open trouble tickets; and
> **user interface logic operable to enable the user to automatically load a proper trouble ticket from any of the plurality of open trouble tickets at the plurality of trouble ticket systems and assign the proper trouble ticket to the user, determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket.**

(Emphasis added).

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Kuhn* does not disclose, teach, or suggest at least "user interface logic operable to enable the user to automatically load a proper trouble ticket from any of the plurality of open trouble tickets at the plurality of trouble ticket systems and assign the proper trouble ticket to the user, determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket," as recited and emphasized above in claim 1.

For example, *Kuhn* describes a GUI interface that allows for access to multiple applications associated with telecommunication service data and information retrieval. *Kuhn* does not teach or suggest assigning trouble tickets to a technician in the manner described above. In particular, *Kuhn* fails to teach or suggest "determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket," as recited in claim 1.

Therefore, *Kuhn* fails to teach or suggest all of the features of claim 1, and thus does not anticipate claim 1. As a result, the rejection of claim 1 should be withdrawn.

b. Claims 2-9, 13, and 18

Because independent claim 1 is allowable over the cited art of record, its dependent claims 2-9 and 13 are allowable as a matter of law, for at least the reason that the dependent claims contain all the features of independent claim 1. *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). Additionally and notwithstanding the foregoing allowability of claims 2-9 and 13, these dependent claims recite further features and/or combinations of features (as is apparent by examination of the claim itself)

that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

As stated above, claim 18 has been canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to the claim is rendered moot.

5.   <u>Response to Rejections of Claims under 35 U.S.C. § 103</u>

In the Office Action, claims 10-11, 14-17, 19-25, and 27-45 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Kuhn* in view of *Jones* (U.S. Patent No. 6,763,333). Claim 12 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Kuhn* in view of *Doherty* (U.S. Patent No. 6,735,293). Claims 26 and 46-47 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Kuhn* in view of *Jones* in further view of *Doherty*.

    a. <u>Claims 10-12 and 14-17</u>

All of the claimed features of independent claim 1 are not taught or suggested by *Kuhn*, as previously discussed. Further, the cited art of *Jones* and *Doherty* fails to cure the deficiencies of the *Kuhn* reference in suggesting or teaching all of the claimed features in claims 10-12 and 14-17 (which depend from independent claim 1). Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kuhn* with *Jones* or *Doherty* has not been made. Accordingly, the rejections of claims 10-12 and 14-17 should be withdrawn.

As an example, *Doherty* describes that "work orders are automatically generated in accordance with technician work schedules and skill levels, and the work orders are dispatched electronically to the technician assigned to perform a service installation or equipment repair." Col. 2, lines 35-39. Therefore, *Doherty* does not teach or suggest any of the claimed approaches. With regard to *Jones*, it describes systems and methods for monitoring trouble tickets that have not been resolved but does not appear to be directed toward assigning trouble tickets to a technician in the manner described above in any of the claims.

Accordingly, the rejections of claims 10-12 and 14-17 should be withdrawn.

b. Claim 19

As provided in independent claim 19, Applicants claim:

A method of assigning trouble tickets, comprising:

periodically polling a plurality of trouble ticket systems for at least one trouble ticket associated with a support center;

sorting said at least one trouble ticket with a plurality of previously received trouble tickets;

storing a plurality of sorted trouble tickets in a memory device;

receiving a request for a trouble ticket from a technician at the support center; and

providing the technician with a proper trouble ticket from the plurality of sorted trouble tickets, determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket.

(Emphasis added).

Applicants respectfully submit that independent claim 19 is allowable for at least the reason that *Kuhn* in view of *Jones* does not disclose, teach, or suggest at least the feature of "providing the technician with a proper trouble ticket from the plurality of sorted trouble tickets, determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket," as recited and emphasized above in claim 19.

For example, *Kuhn* describes a GUI interface that allows for access to multiple applications associated with telecommunication service data and information retrieval. *Kuhn* does not teach or suggest assigning trouble tickets to a technician in the manner described above. In particular, *Kuhn* fails to teach or suggest "determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket," as recited in claim 19. With regard to *Jones*, it describes systems and methods for monitoring trouble tickets that have not been resolved but does not appear to be directed toward assigning trouble tickets to a technician in the manner described above in claim 19.

Therefore, *Kuhn* in view of *Jones* fails to teach or suggest all of the features of claim 19. As a result, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kuhn* in view of *Jones* has not been made. Thus, the rejection of claim 19 should be withdrawn.

c. Claims 20-32

All of the claimed features of independent claim 19 are not taught and suggested by *Kuhn* and *Jones*, as previously discussed. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kuhn* with *Jones* has not been made. Therefore, the rejections of claims 20-25 and 27-30 should be withdrawn. Further, the cited art of *Doherty* fails to cure the deficiencies of the *Kuhn* and *Jones* references in suggesting or teaching all of the features in claim 26 (which depends from independent claim 19). Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kuhn* in view of *Jones* in further view of *Doherty* has not been made. Accordingly, the rejections of claim 26 should also be withdrawn.

For example, *Doherty* describes that "work orders are automatically generated in accordance with technician work schedules and skill levels, and the work orders are dispatched electronically to the technician assigned to perform a service installation or equipment repair." Col. 2, lines 35-39. As such, *Doherty* does not teach or suggest the approach of claim 26. Accordingly, the rejections of claims 20-30 should be withdrawn.

Claims 30-32 are canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to these claims are rendered moot. Applicants take this action merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicants reserve the right to pursue the subject matter of these canceled claims in a continuing application, if Applicants so choose, and do not intend to dedicate any of the canceled subject matter to the public.

d. Claim 33

As provided in independent claim 33, Applicants claim:

> A computer readable medium having a program for assigning a trouble ticket to a responsible technician, the program operable to perform:
> periodically polling a plurality of trouble ticket systems for at least one trouble ticket associated with a support center;
> sorting said at least one trouble ticket with a plurality of previously received trouble tickets responsive to a tracking key and time stamp included with each of the trouble tickets;
> storing a plurality of sorted trouble tickets in a memory device;

receiving a request for a trouble ticket from a technician at the support center; and

assigning the technician to a proper trouble ticket from the plurality of sorted trouble tickets, determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket.

(Emphasis added).

Applicants respectfully submit that independent claim 33 is allowable for at least the reason that *Kuhn* in view of *Jones* does not disclose, teach, or suggest at least the feature of "assigning the technician to a proper trouble ticket from the plurality of sorted trouble tickets, determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket," as recited and emphasized above in claim 33.

For example, *Kuhn* describes a GUI interface that allows for access to multiple applications associated with telecommunication service data and information retrieval. *Kuhn* does not teach or suggest assigning trouble tickets to a technician in the manner described above. In particular, *Kuhn* fails to teach or suggest "assigning the technician to a proper trouble ticket from the plurality of sorted trouble tickets, determination of the proper trouble ticket being based upon regulatory fines that are subject to being levied against the proper trouble ticket," as recited in claim 33. With regard to *Jones*, it describes systems and methods for monitoring trouble tickets that have not been resolved but does not appear to be directed toward assigning trouble tickets to a technician in the manner described above in claim 33.

Therefore, *Kuhn* in view of *Jones* fails to teach or suggest all of the features of claim 33. Accordingly, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kuhn* in view of *Jones* has not been made. Thus, the rejection of claim 33 should be withdrawn.

e. Claims 34-47

All of the claimed features of independent claim 33 are not taught and suggested by *Kuhn* and *Jones*, as previously discussed. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kuhn* with *Jones* has not been made, and the rejections of claims 34-42 should be withdrawn. Further, the cited art of *Doherty* fails to cure the deficiencies of the *Kuhn* and *Jones* references in suggesting or teaching all of the features in claims

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46-47 (which depends from independent claim 33). Accordingly, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kuhn* in view of *Jones* in further view of *Doherty* has not been made. Therefore, the rejections of claims 46-47 should also be withdrawn.

As an example, *Doherty* describes that "work orders are automatically generated in accordance with technician work schedules and skill levels, and the work orders are dispatched electronically to the technician assigned to perform a service installation or equipment repair." Col. 2, lines 35-39. Therefore, *Doherty* does not teach or suggest the approaches of claims 46-47, and the rejections of claims 34-42 and 46-47 should be withdrawn.

Claims 43-45 are canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to these claims are rendered moot. Applicants take this action merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicants reserve the right to pursue the subject matter of these canceled claims in a continuing application, if Applicants so choose, and do not intend to dedicate any of the canceled subject matter to the public.

CONCLUSION

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well known for at least the specific and particular reason that the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. In addition, Applicants reserve the right to address any comments made in the Office Action that were not specifically addressed herein. Thus, such comments should not be deemed admitted by the Applicants. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

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